

DAL BON & MARGAIN, APC
TOMAS E. MARGAIN - 193555
28 North 1st, Suite 210
San Jose, CA 95113
Telephone: (408) 297-4729
Facsimile: (408) 297-4728

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

BACILIA ARROYO,

Plaintiff (s),

v.

NAGIB HADDAD, ET AL,

Defendant(s).

No. C 10-05185 LB

**STIPULATION AND ~~PROPOSED~~
ORDER RE: STAY OF PROCEEDINGS
PENDING DEFENSE COUNSEL'S
MOTION TO WITHDRAW**

Action Filed: November 16, 2010
Initial CMC: March 10, 2011
Trial Date: Not Set

Pursuant to Local Rule 6-1, Plaintiff BACILIA ARROYO and Defendants Nagib Haddad and Sweet Paradise Fine Foods, Inc., by and through their respective attorneys of record, hereby state, agree and stipulate as follows:

1. The matter was filed on November 16, 2010.
2. When counsel for the parties began meeting and conferring on Rule 26 disclosures and the initial Case Management Conference statement, Defendant's counsel reached an impasse with his clients as to whether he could continue to represent them.
3. He is currently seeking to have his clients voluntarily substitute him out of the case. In the event this does not occur, he will move to withdraw.
4. The following events are set to occur in the next 30 days: (1) parties Rule 26 deadlines; Parties deadline to file a Case Management Statement; (3) Initial Status Conference.
5. In order to protect the rights of Defendants, the Parties hereby stipulate to a stay of all proceedings and continuance of all deadlines in this case sixty (60) days. This will allow Defendants notify the Court and Plaintiff's counsel that they have retained substitute counsel in this action or, in the alternative, for counsel to move to withdraw from representing Defendants.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED: March 3, 2011

By: /s/ Steven P. Cohn
Attorneys for Defendants

DATED: March 3, 2011

DAL BON & MARGAIN, APC

By: /s/s Tomas Margain
TOMAS E. MARGAIN
Attorneys for Plaintiff

PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN. THE COURT ORDERS AS FOLLOWS:

All proceedings in this matter are stayed and all deadlines shall be continued 60 days as follows:

- (1) Last Day to meet and confer re initial disclosures and early settlement, ADR process selection and discovery plan: April 28, 2011.
- (2) Last Day to file Rule 26(f) Report, complete initial Disclosures: May ¹²5, 2011
- (3) Last Day to File Joint Case Management Statement Due: May ¹²5, 2011
- (4) Initial Case Management Conference: May ²⁶5, 2011 at 10:30 a.m.

IT IS SO ORDERED.

DATED: March 4, 2011

By: 

LAUREL BEELER
United States Magistrate Judge